Honeywell P.O. Box 2245 Morristown, NJ 07962-2245

973 455 2817 973 455 5904 Fax david.cooke@honeywell.com

David P. CookeAssistant General Counsel

00, 00 3001

October 8, 2001

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029
Via UPS Delivery

Re: Lower Darby Creek Area Superfund Site

Dear Ms. Prisk:

On September 10, 2001, I sent to you the responses of Honeywell International Inc., as successor of Allied Chemical Inc., to EPA's §104(e) Request for Information regarding this site. Since then, we have found additional documents relevant to the Request for Information. These documents relate to disposal practices at Allied Chemical's Delaware Valley Works plant and are attached as Attachments 1 and 2 to this letter. The information reflected in these documents is provided in the following supplemental responses to Questions 7, 9 and 10 of the Request for Information (we have tried to avoid being repetitious in our responses even though there is some overlap among the various questions):

7) Delaware Valley Works: As noted in our initial response, the Delaware Valley Works was essentially divided into two locations: one in Claymont, Delaware, the other in Marcus Hook, PA. Before 1979 the Marcus Hook portion of the plant was called Baker and Adamson Works. Since our initial response we have found additional Eckhardt Reports compiled by Allied Chemical for the Baker and Adamson Works. We also found three other documents concerning waste disposal practices at the Baker and Adamson Works: two are waste surveys completed in 1969 and 1970 and one is a memo written in 1970. These documents are included in Attachment 1.

With respect to the Claymont, Delaware portion of the Delaware Valley Works plant, we have found transaction documents related to disposal by Wright Construction Company, in 1972, of 400 tons of phosphoric acid muds in a pit located on the Claymont facility's property. Other documents suggest that ABM Disposal Services returned three fluorine cylinders to Allied Chemical. (We have also located other



documents related to ABM Disposal Services which we did not have at the time of our initial response.) All of these documents are included in Attachment 2.

- 9) (a-c) Delaware Valley Works: In December 1969, the Baker and Adamson Works submitted a waste survey to Pennsylvania's Department of Health (included in Attachment 1) in which it indicated that "landfills in Folcroft" were among the places that a company called Gene Banta Sanitation Company transported its solid waste. Honeywell has no knowledge as to whether the survey's reference to "landfills in Folcroft" refers to the Site. It appears from the survey that Gene Banta selected the disposal sites. An Eckhardt Report (included in Attachment 1) indicates that Gene Banta had its business office in Chester, Pa. Honeywell has no information regarding the current status or existence of Gene Banta Sanitation Company.
- 10) (a-e) As mentioned in our supplemental response to Question 9, a 1969 waste survey indicates that Gene Banta Sanitation Company disposed of waste at "landfills in Folcroft". Honeywell has no knowledge as to whether this reference refers to the Site. Nonetheless, Honeywell offers the following response:

The waste survey gives no specific dates of disposal at Folcroft landfills. Nor does it indicate the length of time Gene Banta Sanitation Company may have disposed of waste at "Folcroft landfills," or the quantities that may have been disposed of at these landfills. It appears from the survey that burnable solid waste was incinerated and that non-burnable solid waste was landfilled. Glass, metal and chemicals were the types of solid waste disposed of in landfills. In March 1970, the Baker and Adamson Works submitted to The Travelers Research Corporation a waste survey (included in Attachment 1) in which it is stated that chemicals in trash included "floor sweepings and other such materials for which no practical method of recovery is available." It is further indicated that such chemicals were not hazardous.

If you have any questions about these responses, please call me.

Very truly yours,

ATTACHMENT 1

DELAWARE VALLEY WORKS (BAKER & ADAMSON WORKS) Marcus Hook, PA

By Athers Le

April 30, 1970

The Travelers Research Corporation 250 Constitution Flasa Martford, Commecticut 06103

Attention: Mr. Peter Kalika, Project Engineer

Gentlemen:

In response to your request of March 2, 1970, we are returning a completed copy of your questionnaire covering our solid waste disposal practices.

Yery truly yours,

SPECIALTY CHEMICALS DIVISION Baker & Adamson Works

ORIGINAL SIGNED E. J. SHIELDS

E. J. Shields Manager

EJE/eg

ce: B&A, Mr. J. Tourish, Supt. Technical

B&A, Mr. N. Wallace, Supt. Maintenance

B&A, Mr. R. Hemmenway, Supt. Production MTO, Mr. J. A. Gouck, Specialist-Air & Water Control

MTO, Mr. J. L. Mason, Jr. Director of Production

The Travelers Research Corporation 250 Constitution Plaza Hartford, Connecticut 06103 Contract No: CPE 69-5

Budget Bureau No. 85-S 88017. Approval expires August 31, 1970

"NATIONAL INDUSTRIAL SOLID WASTE MANAGEMENT "STUDY OF THE INDUSTRIAL CHEMICAL INDUSTRY"

Industrial Survey Questionnaire

,2378	Allied Chemical Co	rporation
Plant identification number	Company name	
Baker & Adamson Works, Specialty Chemicals Div	vision	
Company division and plant name		
Marcus Hook, Pennsylvania 19061		
Plant address		: · · · · · · · · · · · · · · · · · · ·
T. Harris, Supvr Technical		
Name and title of person completing questionnaire		
Please provide the following general plant information		
(a) Total plant employment	less than 100	100 to 500 🗌
	500 to 1000 区	greater than 1000
(b) Size of plant location 50 acres, of which 40 are production facilities.	re devoted to	
(c) Nature of area surrounding plant site: rural	residential 🛭 urban 🗌	
(d) Does plant use public solid waste disposal sites?		Yes 🗌 No 🗵
If yes, municipal 🔲 county 🔲 regions	al other (specify)	
(e) Are there local, regional, or state regulations in effe	ect that govern your solid waste	
activities?		Yes 🛭 No 🗌
If yes, specify Pennsylvania Solid Wa	aste	_
Management Act (Act	241)	, section

2. Please complete the following regarding Non-Process solid waste activities:

	Quantity	(ton/yr)*	Source	e Areas	- ;	Storage (check)		Storage	Ultimate disposal site &		
			%	produc- produc-	Containers		T	period	agency (on-site, off-site, captive, private,			
•	Measured	Estimated	produc-		uc- Bulk	Bulk Com-	Casual	Other	(days)	municipal)		
			tion	tion		paction			Disposition		1 %	
Combustibles (paper, wood, bags, etc.)	·	1000	100		V	V			i	municipal incinerato	r 100	
Non-combustibles (glass, drums, etc.)†		960	100		✓				1	municipal landfill private	50 50	
Salvageable metal		10	100				V		30	Sale	100	
Total		1 <i>9</i> 70								1972		

^{*}Estimate percentage of quantities resulting from manufacture of S₁LC. 281 chemicals: Combustibles 100%, non-combustibles 100%, salvageable metals 100%.

The Travelers Research Corporation 250 Constitution Plaza Hartford, Connecticut 06103 Contract No. CPE 69-5

Industrial Survey Questionnaire Plant Identification Number 2378

2. (cont'd.)

Classification	Ult	imate Dispo	sal Method	Cost of Disposal	Remarks (e.g., additional detail on sources,
	Land fill	Incinera- tion	Other (burn- ing, dump, etc.)	\$/Ton (includ- ing collection less applicable credit)	composition, etc.)
Combustibles		✓.		\$20.00	
Non-combustibles	√		Private Dump	\$20.00	
Salvageable metal			Sale	Break Even	

[†]Excluding salvageable metal.

3.	Please identify the process solid wastes which are handled at your plant	: (from the manufacture of S.I.C. 281 chemicals)

X Studges	☑ Off quality product
▼ Filter residues	Other Spent Catalyst
▼ Tars	Other
Flyash	Other

4. For each waste checked above, what are the sources (products or product groups) and quantities (tons per year)?

Filter Residues Industrial Inorganic Chemicals 104 Tons Off quality Prod. Industrial Inorganic Chemicals 5 Tons Sludge Industrial Inorganic Chemicals 15 Tons	Waste	Source	Quantities
Off quality Prod. Industrial Inorganic Chemicals 5 Tons Sludge Industrial Inorganic Chemicals 15 Tons	Catalyst	Industrial Inorganic Chemicals	15 Tons
Sludge Industrial Inorganic Chemicals 15 Tons	Filter Residues	Industrial Inorganic Chemicals	104 Tons
Joago meditre morganic	Off quality Prod.	Industrial Inorganic Chemicals	5 Tons
Tars Industrial Organic Chemicals 1 Ton	Sludge	Industrial Inorganic Chemicals	15 Tons
14.00011.00.019.0000	Tars	Industrial Organic Chemicals	1 Ton

The Travelers Research Corporation 250 Constitution Plaza Hartford, Connecticut 06103 Contract No. CPE 69-5

Industrial Survey Questionnaire Plant Identification Number 2378

5. For each process waste please complete the following tables:

A. Storage and Disposal

Waste	Storage (con- tainers, casual, etc.)	Storage period (days)	How transported to disposal area (truck, pipe line, captive, contract, municipal)	Disposal (on-site off-site)	Nature off- site disposal (private, municipal, regional)	Method of disposal (Landfill, incinerator, dump, casual)
Catalyst	Cont.	1	Contract	Off		
Filter Residues	Cont.	1	Contract	Off	Munic. &	Landfill
Off-quality product	Cont.	1	Contract	Off	Private	Dump
Sludge	Cont.	1	Contract	Off		
Tars	Cont.	Varies	Contract	Off	Private	Dump
			;			
	.					

B. Cost of Disposal

Waste	Cost of storage \$/ton	Cost of pre- treatment or special handling \$/ton	Cost of transport- ing \$/ton	Cost of disposal \$/ton	Total salvage cost, if any \$/ton	Credit
Catalyst	-	_	-	\$20	None	None
Filter Residues	_	-		\$20	None	None
Off-quality Product	_		-	\$20	None	None
Sludge	_	_	-	\$20	None	None
Tars	_	-	-	\$30	None	None
						

6. For each waste, what are the physical and chemical characteristics pertinent to solid waste disposal activities (e.g., chemical identification, heating value, solubility, consistency, toxicity, density, etc.)?

Waste	Characteristics	
Catalyst	Carbon Catalyst - Non-Combustible	
Filter Residues	Insoluble Inorganic Residues - Non-Combustible	-
Off-quality prod.	Inorganic Chemicals - Non-Combustible	
Sludge	Solid Organic Chemicals – Insoluble	
Tars	Organic Still Bottoms - Fuming - Irritating - Insoluble	
-	Comment: While none of the process wastes in the above categories	S
	would constitute a high degree of toxicity by industry standards, ea	ıch
4	would contain some components that would be considered "toxic" in	fh

public's concept of the term.

The Travelers Research Corporation 250 Constitution Plaza Hartford, Connecticut 06103 Contract No. CPE 69-5

Industrial Survey Questionnaire Plant Identification Number 2378

7. For each process waste, please identify the plant operating parameter which most directly influences waste generation:

Waste	Operating Parameter (Purity of raw material, degree of reaction, etc.)	Quantitative Relationship if known
Catalyst	Raw Material Utilization	
Filter Residues	Raw Material Purity	
Off-Quality Product	Product Quality	
Sludge	Raw Material Purity	
Tars	Reaction By -Product	

Waste	Quantity Tons/Year	Disposal Practice	Estimated Cost \$/Ton
Catalyst	18	Private Contractor	\$32
Filter Residues	124	н	\$32
Off-Quality Product	6	11	\$32
Sludge	6	tt.	\$32
Tars	1	11	\$48

Э.	Remarks: Please provide any additional comments, which may be pertinent to the survey (e.g., any special problems encountered with particular wastes, nature of waste which prohibits certain disposal methods, etc.)
	1) Plant uses all available methods for salvaging off-grade chemicals. Those appearing in
	trash consist of floor sweepings and other such materials for which no practical method of
	recovery is available. In any case, materials so disposed of are not hazardous.
	2) Principal disposal problem is potentially hazardous chemicals that cannot be disposed of
	as ordinary non-burnable trash. These materials were once spread on the ground at a
	company -owned dump, but this practice has been discontinued and these materials are
	now being accumulated in drums and being held for disposal pending a reasonable solution

December 16, 1969

Commonwealth of Pennsylvenia Department of Health P. O. Box 90 Harrisburg, Pa. 17120

Gentlemen:

Attached is the completed questionnaire as requested in your latter to our corporate headquarters on the subject, dated October 24, 1969.

Very truly yours,

SPECIALTY CHEMICALS DIVISION Below & Ademson Works

ORIGINAL SIGNED

J. TOURISH

J. Tourish Supt. Technical

JT :mb

Attachment

cc: /B&A, Mr. E. Shields, Manager / MTO, Mr. J. A. Gouck, Specialist, Air & Water Control

Capital Capita

The Pennsylvania Solid Waste Management Act (Act #241) Industrial and Municipal Questionnaire Solid Waste Processing and Disposal Site Permit Program

Name of	firm or municipality: Allied Chemical Corp., Baker & Adamson Works
	Address: Marcus Hook
	County: Delaware
1. a)	List types of waste which result from production or collection:
	1) Burnable trash.
	2) Non-burnable (metal, glass, chemical).
b)	Of the above waste types, list those which are recycled or reused in the processing or manufacture of other products:
	None
2. a)	Does your municipality, company or firm <u>dispose</u> of solid wastes on-premise or otherwise operate a solid waste disposal site(s)?
	YesNo/
b)	If answer to number 2 a) is yes, list location of the solid waste disposal site(s):
3. a)	Does your municipality, company or firm <u>process</u> solid wastes on-premise or otherwise operate a solid waste processing site(s)?
	YesNo
b)	If answer to number 3 a) is yes, list location of the solid waste processing site(s):
	answer to numbers 2 and 3 is no, list name and location of site(s) re solid wastes are processed or disposed of: All solid wastes removed under contract with Gene Banta Sanitation Company
	Disposal sites reported include Delaware County Municipal Incinerator, and
	landfills in Folcroft and Brookhaven (Delaware County).
	Signature of Official Date
Re to	rn this completed questionnaire within thirty (30) days to:
	Solid Waste Section Division of Community Environmental Services Pennsylvania Department of Health

P. O. Box 90 Harrisburg, Pennsylvania 17120

COMPANY CORRESPONDENCE

TO DIV: Specialty Chemicals

FROM DIV: Specialty Chemicals

LOCATION:

Morristown Office, Manufacturing

LOCATION: Baker & Adamson Works

ATT'N OF:

Mr. J. L. Mason, Dir. of Production

DATE: May 11, 1970

SUBJECT:

SOLID WASTE INVENTORY

TRAVELERS RESEARCH CORPORATION

- Being dumped on plant property.

J. Towned to tack

1. We refer to your teletype of 5/5/70 on the captioned subject.

- 2. The Works accumulates unsalvageable chemicals that, for one reason or another, represent too great a potential hazard to be put into the non-burnable trash category. Typical materials include:
 - a) Sodium metal and peroxide.
 - b) Phenol.
 - c) Cyanides.
 - d) Ammonium and sodium sulfides.
 - e) Sulfan.
 - f) Trichloroacetyl chloride still bottoms.
 - g) Strong oxidizers.

Small quantities of some of these chemicals can be sewered but this is not a large enough factor to be of significance. As a rough estimate, there is presently some 10,000 pounds of these chemicals in the plant in individual containers ranging from one pound bottles to 55 gallon drums. Most of it is obviously in drums, and Ammonium Sulfide comprises about half of the total weight.

- 3. A second category of potentially hazardous chemicals is represented by about 5,000 lbs of unidentified material in rusted drums from which all identifying marks have been obliterated. For the most part, the drums are in such poor condition that they couldn't be safely opened or, in some cases, moved.
- 4. A final category is water immiscible solvents for which no use can be found. Presently they are emptied on the ground and allowed to evaporate, but solid waste regulations and air pollution considerations will most probably necessitate our abandoning this practice shortly.
- 5. Regarding a solution to the problem; a combination of remedies will most likely be the final answer. Possible avenues include:
 - 1) Return to the vendor for disposal.

Mr. J. L. Mason, Dir. of Production

Re: Solid Waste Inventory

May 11, 1970

- 2) Scrap chemical dealers.
- 3) Contract process waste disposal (such as advertised by Rollins-Purle).
- 4) Controlled burning of solvents (where only CO₂ and H₂O are produced).

The Works is presently considering the whold matter of off-grade unusable chemicals from the standpoint of handling, and departmental responsibility as well as ultimate disposition, and intends to develop formal guidelines in the near future.

ORIGINAL SIGNED

TOURISH
J. Tourish
Supt. Technical

JT:mb

cc:

B&A, Mr. E. J. Shields, Manager

MTO, Mr. J. A. Gouck, Specialist-Air & Water Control
B&A, Mr. N. Kuller, Supt. Production
B&A, Mr. R. Hemmenway, Supt. Production

Company Name: Allied	Chemical Corporation	MECEIVEU JUN 18 1970
Facility Name: Baker	Adamson Works	
	ton Turnpike	- Clarican
No.	Street	a fifth
City	Hook, Pennsylvania 19061 State Zip Code	
Name of Person Completing	Form: Alfred G. Bisignani	- Joles - Wastes
Position: Superviso	r, Environmental	_ Wastes
Phone Number: (201) 45	5-4294	
1 Vann Engility Omenad		10 MM + (10 11)
·		
·	wate of process water (evaluding	2869
sold for use) generate	ounts of process wastes (excluding ed by this facility during 1978:	wastes
	thousand gallons	. [] [16-24]
	hundred tons	. 1 2 4 (25-32)
•	thousand cubic yards	. [] [(33-41)
4. Estimate (in whole per generated in 1978 were	cents) how these process wastes disposed of:	
	in landfill	9 0 (42-44)
	in pit/pond/lagoon	(45-47)
	in deep well	(48-50)
	incinerated	(51–53)
•	reprocessed/recycled	(54–56)
	evaporated	(57-59.)
•	unknown	(60-62)
	other (Specify Awaiting Disposa	1 (63-65)
property where this fa used for the disposal	er of known sites (including disp cility is located as one site) th of process wastes from this facil	at have been ity since
	" FOR EACH OF THE SITES	
	s wastes generated at this facili	tv been
hauled (removed) from	this facility for disposal? (Yes=	1; no=2) [1] (69)
IF YES, COMPLETE FOR		
hauled from your facil	al site locations of all of the p ity since 1950? (Yes=1; no=2)	
MHO TOOK WASTE TO AN		
8. Specify the earliest y or facility records su	ear represented by information $\frac{fr}{}$	om company 19[5] 8] (71:-72)
9. Specify the earliest y knowledge supplied on	ear represented by information fr this and other forms	om <u>employee</u>

Item #4 (Other - Specify)(Cont'd)

Material	Tons
BNSA Muds (in drums)	8
Solvents (in drums)	15
Misc. Chemicals (in drums)	24
EPS Basin Sludge (basins are rubber lined)	112
Calcium Acetate Muds (in drums)	4
Phenol Strippers (in drums)	25
BF3 Etherate BF3 Phenalate (in drums)	14
Perclene Still Bottams (in drums)	7
Total	209

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Como	oany Name:	Allied	Chemical (Corporation	1		な ^{***} i
	lity Name		and Adamson			-	7
	of Site:	Kin Buc	Landfill				
Addr	ess of Si	te: Meadow	Road			-	
		no.	street		•	_	
		<u>Edison</u> c ity		NJ State	zip code	-	
		•				_	
Name Addr		(while used by	y facility):	Scotch Pl	c Chemical Tains, NJ	<u>reatment</u>	
	 	no.	street			,	
		city	······································	state	zip code	_	
Curr	ent Owner	(if different	from above)		-		
Addr		no.	street			-	
		110,	301000				
		city		state	zip code	•	
3. (4.) 5.) 6. ?	company ow Current st Year first Year last still in u Total amou	mership) 5=pulcatus (1= close IF CLOSED, specused for procused for procused for processe)	polic ownershiped; 2= still ecify year clusters waste from thousand hundre thousands all method(see all method(in use; 9=do losed rom this facility and gallons ed tons and cubic yar s) used at si	2=private but m't know) lity ity (enter "79 disposed at s ds te and whether in use; 3=nev	191191191 ite:	76 (13-14) 74 (15-16) 76 (17-18)
S	9=don't kn	ow)	landfi landfi landfi pits/p deep v land f incine treatm	ill, mixed in ill, drummed ill, municipa conds/lagoons well injection	ustrial waste dustrial waste waste	sposed	(43) (9) (44) (9) (45) (9) (46) (9) (47) (9) (48) (9) (49) (9) (50)
J .8	Users of t facilities	his site (l=th only; 3=this	is facility;	2=this faci	lity and other n't know)	company	ور (S3) اور (S3)

LIST NAVES AND ADDRESSES OF OTHER KNOWN USERS BELOW

The process wastes sent to the landfill averages approximately 75% water and 25% solids. The heavy metals and trace metals were present in minute quantities and were required to be listed as contained in the process waste.

The analysis of the water portion of the sludge for years 1974, 1975, 1976 are as follows:

Metal	<u>Quantity</u>
Arsenic	<0.03 ppm
Selenium	<0.17 ppm
Antimony	No analysis
Mercury	<.01 ppm
Iron	< 4.8 ppm
Manganese	<1.5 ppm
Magnesium	<12.8 ppm
Zinc	< 6.9 ppm
Cadmium	<0.11 ppm
Copper	< 1 ppm
Chromium	<0.75 ppm
Chromium ⁺⁶	No analysis
Lead	< 1.6 ppm
Organics	
Oil & Oil Sludge	<3.2 ppm

Fac	lity Name: Baker and Adamson Works		
Sit	Name: Kin Buc		
9.	Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)		
	FILL IN EVERY BLOCK SPACE		
	Acid solutions, with pH<3. pickling liquor	· · · [2	J (11
	metal plating waste circuit etchings inorganic acid manufacture	$\cdots \underbrace{12}_{2}$] (13] (14
	organic acid manufacture Base solutions, with pH>1012. caustic soda manufacture nylon and similar polymer generation	· · · <u>[2</u> · · · <u>[2</u> · · · [2	ا (16) (17) (18)
	scrubber residual leavy metals & trace metals (bonded organically CR inorganically) arsenic, selenium, antimony mercury	<u>[1</u>	(20) (21)
,	iron, manganese, magnesium zinc, cadmium, copper, chromium (trivalent) chromium (hexavalent)	· []	[(23) [(24) [(25)
•	lead adioactive residues, >30pico curies/liter AMM. uranium residuals & residuals for UF6 recycling lathanide series elements and rare earth salts phosphate slag	·· [9	յ (28) Լ (29)
	thoriumradiumradium	. 19	j (31) j (32) i (33)
•	rganics	· 19	j (36) i (37)
	rodenticides & intermediates	[9	(39) (40) (41)
	PCB/PBB's amides, amines, imides plastizers resins	[9	(42) (43) (44)
	elastomers solvents polar (except water) carbontetrachloride trichloroethylene	ون اون اون	(46) (47) (48)
	other solvents nonpolar solvents halogenated aliphatic solvents halogenated aromatic	[a]	(S0) (S1) (S2)
	oils and oil sludges esters and ethers alcohols ketoncs & aldehydes	9	(53) (54) (55) (56)
	dioxins norganics salts mercaptans	<u>명</u> · · 님	(57) (58) (59)
i	jscpharmaceutical wastes paints & pigments	[9] [9]	(61) (62) (63)
	catalysts (eg. vanadium, platinum, palladium)	· • [9]	(65) (66) (67)
	wastes with flash point below 100° F	لها روا ۰۰	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Com	pany Name:	Alli	ed Chemica	l Corporat	ion		w.
	ility Name:		r and Adam				
	of Site:		ney Landfi				
	ress of Site:		know				
•	• • • • • • • • • • • • • • • • • • • •	no.	street				
		Prool	chaven Pen	nauluania			
		city	Maven Pen.	state	zip code	_	
		CIC		State	LIP COGC	•	
Name	of Owner (w	hile used by	facility):	don't kn	ow		
Add	ress:	-				-	
		no.	street			٠,	
				•			
		city	•	state	zip code	_	
Cum	rent Owner (i:	=	from above).	don!	=		
	ress:	i diriciciic	TIOM above).		C Allow	***	
		no.	street			_	•
					•		
		city		state	zip code	-	
		020,		• • • • • • • • • • • • • • • • • • • •	- - p		
 5. 6. 7. 	Current state IF Year first us Year last use still in use) Total amount Specify type(us (1= close CLOSED, spe sed for proce d for proce of process (s) of dispo	d; 2= still cify year cl ess waste fro ss waste fro waste from t thousa hundre thousa sal method(s	in use; 9=do osed om this facil m this facility nd gallons . d tons nd cubic yar) used at si	n't know) ity ity (enter "7	19714 site:	(12) 41 (13-14) 11 (15-16) 11 (17-18) 1 (19-26)
8.	facilities or	ıly; 3≈this 	landfi landfi landfi pits/p deep w land f incine treatm reproc other is facility; company and	11, mixed in 11, drummed 11, municipa onds/lagoons ell injectio arming ent (eg. neu essing/recyc (specify) 2=this facioothers; 9=do	tralizing)linglity and other	isposed [2]	21 (42) 21 (43) 21 (44) 21 (45) 21 (46) 21 (47) 21 (48) 21 (50) 21 (51) 21 (52)
	LIST NAVES A	ND ADDRESSE	s of other k	NOWN USERS B	ELOW	•	

Heavy Metals and Trace Metals (Items 20 % 26)

Although the process wastes were not analyzed for metals, unused portions of samples used for laboratory analysis were included in the material sent to the landfill. However, the amount of Heavy Metals that may have been inlcuded would be estimated to be less than 0.5%, due to the type of products manufactured at B&A Works.

Facility Name: Baker and Adamson Works

Site Name: Sweeney Landfill

 Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions with pH<3	121	(10)
Acid solutions, with pH<3 pickling liquor	2	(iii
metal plating waste	121	(12)
circuit etchings	121	(13)
circuit etchings inorganic acid manufacture	121	(14)
organic acid manufacture	121	(15)
Base solutions, with pH>1012	121	(16)
caustic soda manufacture	121	(17)
nylon and similar polymer generation	121	(18)
scrubber residual	121	(19)
Heavy metals & trace metals (bonded organically one inorganically)	Π	(20)
arsenic, selenium, antimony	П	(21)
mercury	Π_1	(22)
iron, manganese, magnesium	固	(23)
zinc, cadmium, copper, chromium (trivalent)	111	(24)
chromium (hexavalent)	رق	(25)
lead	Ū	(26)
Radioactive residues, > Topico curies/liter Gram. uranium residuals & residuals for UF6 recycling	رور	(27)
uranium residuals & residuals for UF ₆ recycling	رق	(28)
lathanide series elements and rare earth salts	191	(29)
phosphate slag	رق	(30)
thorium	9	(31)
radium	91	(32)
other alpha, beta & gamma emitters	<u>9</u> [(33)
Organics intermediates intermediates	Ē.	(34)
posticiones d'intermediates	<u>9</u>	(35)
herbicides & intermediates	Б.	(30)
rodenticides & intermediates	באו	(2/)
halogenated aliphatics	ريخا	(20)
halogenated ariphatics	יצו	(40)
acrylates & latex emulsions	וא	(40)
PCB/PBB's		(42)
amides, amines, imides		(42)
plastizers	2	(44)
resins		(45)
elastomers		
solvents polar (except water)	ادا	(47)
carbontetrachloride	91	(48)
trichloroethylene	9	(49)
other solvents nonpolar	9	(50)
solvents halogenated aliphatic	91	(51)
solvents halogenated aromatic	91	(52)
Oils and oil sludges	Q 1	(53)
esters and ethers	9	(54)
alcoholsketones & aldehydes	99	(55)
ketones & aldehydes	رو	(56)
dioxins	9	(57)
Inorganics	Ш	(58)
salts	ٔ لا	(59)
mercaptans	9	(60)
Misc	91	(61)
pharmaceutical wastes	الو	(62)
paints & pigments	رو	(00)
asbestos	الو	(04)
shock sensitive wastes (eg. nitrated toluenes)	ارو	(05)
Air Water reactive wastes for D. aliminum chlamidal	9 1	(00)
air water reactive wastes (eg. P., aluminum chloride)	9	(60/)
masees with flash point octow 100° r	2.	(00)

lame of Site: Blame of Site: Wind Mine of Owner (while ddress: Pinc Mine of Owner (while ddress: Pinc Mine of Owner (if diddress: No Ci Mine of Owner (if diddress: No Ci Mine of Ownership at time company ownership ow	aker and aker and ilmingtor arcus Hoc ty used by f O. Box cristown ty fferent fr ty property (e of use () p) 5=public 1= closed; SED, speci:	Adamson Adamson Adamson Turnpil street ok, Penns facility): 1057R street n, New Je fom above): street on which f 1= company c ownershi 2= still	Works ke sylvania l state Allied C ersey state : Same state facility is y ownership; ip) in use; 9=d	2ip code Chemical Cor 07960 zip code as above zip code 1ocated; 2= 0 2=private bu	rporation e off-site)	ت 113	(11)
acility Name: Blame of Site: Blame of Site: Blame of Site: Wind Research Re	aker and aker and ilmingtor arcus Hoc ty used by f O. Box cristown ty fferent fr ty property (e of use () p) 5=public 1= closed; SED, speci:	Adamson Adamson Adamson Turnpil street ok, Penns facility): 1057R street n, New Je fom above): street on which f 1= company c ownershi 2= still	Works Works ke sylvania l state Allied C ersey state : Same state facility is y ownership; ip) in use; 9=d	2ip code Chemical Cor 07960 zip code as above zip code 1ocated; 2= 0 2=private bu	rporation e off-site)	ت 113	(11)
lame of Site: B ddress of Site: W no	aker and ilmingtor. arcus Hooty used by f 0. Box cristown ty fferent fr ty property (e of use () p) 5=public 1= closed; SED, speci:	Adamson Turnpil street ok, Penns facility): 1057R street n, New Je fom above): street on which f l= company c ownershi 2= still	Works ke sylvania l state Allied C ersey state : Same state facility is y ownership; ip) in use; 9=d	2ip code Chemical Cor 07960 zip code as above zip code 1ocated; 2= 0	rporation e off-site)	ت 113	(11)
ame of Owner (while ddress: Modern	ilmingtor arcus Hoc ty used by f O. Box cristown ty fferent fr ty property (e of use () p) 5=public 1= closed; SED, speci:	Turnpil street ok, Penns facility): 1057R street n, New Je fom above): street on which f 1= company c ownershi 2= still	sylvania l state Allied C ersey state : Same state facility is y ownership; ip) in use; 9=d	2ip code Chemical Cor 07960 zip code as above zip code 1ocated; 2= 0	rporation e off-site)	ت 113	(11)
ame of Owner (while ddress: Mo Mo Ci Mo Ci urrent Owner (if diddress: no Ci Location (1= the company ownershi at time company ownershi at time company ownershi Current status (IF CLO Year first used Year last used f	used by f O. Box Drristown ty fferent fr ty property e of use (i p) 5=public 1= closed; SED, speci:	company company company company company company company company company company	state Allied Conservation State Same state facility is yownership; ip)	zip code Chemical Cor O7960 zip code as above zip code located; 2= c	rporation e off-site)	ت 113	(11)
ame of Owner (while ddress: Mode	used by f O. Box cristown ty fferent fr ty property e of use (i p) 5=public 1= closed; SED, speci:	facility): 1057R street n, New Je rom above): street on which f 1= company c ownershi 2= still	state Allied Conservation State Same state facility is yownership; ip)	zip code Chemical Cor O7960 zip code as above zip code located; 2= c	rporation e off-site)	ت 113	(11)
ame of Owner (while ddress: Mode	used by f O. Box cristown ty fferent fr ty property e of use (i p) 5=public 1= closed; SED, speci:	facility): 1057R street n, New Je rom above): street on which f 1= company c ownershi 2= still	state Allied Conservation State Same state facility is yownership; ip)	zip code Chemical Cor O7960 zip code as above zip code located; 2= c	rporation e off-site)	ت 113	(11)
ddress: Mo Ci urrent Owner (if di ddress: no Ci Location (1= the Company ownershi Current status (IF CLO Year first used Year last used f	property of of use (ip) 5=public l= closed; SED, speci:	on which for company cownership 2= still	state state facility is y ownership; ip)in use; 9=d	07960 zip code as above zip code located; 2= 0 2=private bu	e	ت 113	(11)
ddress: Mo Ci urrent Owner (if di ddress: no Ci Location (1= the Company ownershi Current status (IF CLO Year first used Year last used f	property of of use (ip) 5=public l= closed; SED, speci:	on which for company cownership 2= still	state state facility is y ownership; ip)in use; 9=d	07960 zip code as above zip code located; 2= 0 2=private bu	e	ت 113	(11)
. Location (1= the company ownershi Current status (IF CLO Year first used Year last used first used company ownershi to the company ownershi current status (IF CLO Year first used first	property of of use (1) property (2) property (3) property (4) property (5) property	on which for company cownership 2= still	state : Same state facility is y ownership; ip)in use; 9=d	zip code as above zip code located; 2= c 2=private bu	off-site)	ت 113	(11)
Location (1= the company ownershi Current status (IF CLO Year first used f	pristown ty fferent fr ty property e of use (1) p) 5=public 1= closed; SED, speci:	on which for the company cownershing 2= still	state : Same state facility is y ownership; ip)in use; 9=d	zip code as above zip code located; 2= c 2=private bu	off-site)	ت 113	(11)
ciurrent Owner (if diddress:	ty fferent fr ty property e of use (ip) 3=public l= closed; SED, speci:	on which f l= company c ownershi 2= still	state : Same state facility is y ownership; ip)in use; 9=d	zip code as above zip code located; 2= c 2=private bu	off-site)	ت 113	(11)
Location (1= the Company ownershi Current status (IF CLO Year first used Year last used find did not be company ownershi to the company ownershi to the current status (IF CLO Year first used first u	ty property (e of use () p) 5=public 1= closed; SED, speci:	on which f l= company c ownershi 2= still	state facility is y ownership; ip)in use; 9=d	zip code located; 2= c 2=private bu	off-site)	ت 113	(11)
. Location (1= the Ownership at time company ownership. Current status (IF CLO. Year first used for the company ownership.	property (e of use () p) 5=public 1= closed; SED, speci:	on which f l= company c ownershi 2= still	state facility is y ownership; ip)in use; 9=d	zip code located; 2= c 2=private bu	off-site)	ت 113	(11)
. Location (1= the Ownership at time company ownership Current status (IF CLO Year first used Year last used f	property (e of use ()p) 5=public l= closed; SED, speci:	on which f l= company c ownershi 2= still	facility is y ownership; ip) in use; 9=d	located; 2= c 2=private bu	off-site)	ت 113	(11)
Location (1= the Ownership at time company ownership. Current status (IF CLO Year first used Year last used f	property (e of use ()p) 5=public l= closed; SED, speci:	on which f l= company c ownershi 2= still	facility is y ownership; ip) in use; 9=d	located; 2= c 2=private bu	off-site)	ت 113	(11)
. Location (1= the . Ownership at tim company ownershi . Current status (property (e of use () p) 5=public 1= closed; SED, speci:	l= company c ownershi 2= still	facility is y ownership; ip) in use; 9=d	located; 2= c 2=private bu	off-site)	ت 113	(11)
. Location (1= the . Ownership at tim company ownershi . Current status (property (e of use () p) 5=public 1= closed; SED, speci:	l= company c ownershi 2= still	facility is y ownership; ip) in use; 9=d	located; 2= c 2=private bu	off-site)	ت 113	(11)
. Ownership at tim company ownershi . Current status (IF CLO Year first used . Year last used f	e of use () p) 5=public l= closed; SED, speci:	l= company c ownershi 2= still	y ownership; ip) in use; 9=d	2=private bu	ut not	ت 113	(11)
. Total amount of . Specify type(s) is still in use 9=don't know)	or process process was	waste from to thousa hundre thousa I method(s	om this facilitand gallons ed tons and cubic yas used at s	lity (enter ' y disposed at irds	'79" if 1 t site:	9 <mark>7 </mark>	(17-18 (19-26
. Users of this si facilities only;	te (1=this	landfi landfi landfi pits/p deep w land f incine treatm reproc other facility;	ill, mixed i ill, drummed ill, municip bonds/lagoon vell injecti farming ration ment (eg. ne tessing/recy (specify) 2=this fac	dustrial wast ndustrial was waste al refuse co- son cutralizing) cutralizing	disposed		(43) (44) (45) (46) (47) (48) (49) (50) (51) (52)
LIST NAVES AND					. 	· E	(22)
TIST REVIEW WID!	かしいにつつにつ し	117 L 1 L 1 L 1 L 1 L 1 L 1 L 1 L 1 L 1	AND DESCRIPTION OF THE PARTY OF	DCIAN I			

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Allied Chemical Corp., Elizabeth Works 100 North Avenue, East Elizabeth, NJ 07201

Facility Name:	Baker and Adamson Works
Site Name:	Same as above

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	1111	(10)
pickling liquor		
metal plating waste	121 ((12)
circuit etchings		
in and it and it and it and it is a second	ر بکا	(24)
inorganic acid manufacture	21 \	(14)
organic acid manufacture	111 ((15)
Base solutions, with pH>10/2	(čraš
base solutions, with physic is	ر لکا	>
caustic soda manufacture		
nylon and similar polymer generation	21 ((181
scrubber residual	ز بچا	(10)
scrubber residual	ر لکا	727
Heavy metals & trace metals (bonded organically c? inorganically)	11((20)
arsenic, selenium, antimony	7 6	211
area of Section and Area of Section 19	ز بیا	555
mercury	T) i	22)
iron, manganese, magnesium	11 ((23)
zinc, cadmium, copper, chromium (trivalent)	7 7	'24\
anie, continuit, copper, critical (travarency received the continuity copper)	ز پ	257
chromium (hexavalent)	9](.25)
lead	11 ((26)
lead	<u> </u>	275
radioactive residues, sopries curies, street	ز بد	366
uranium residuals & residuals for UF6 recycling	9](_Z8)
lathanide series elements and rare earth salts	<u>a</u> ı (29)
phosphate slag	7 ہے	ัรกา
phosphace stag	ر بع	30)
thorium		
radium	91(32)
other alpha, beta & gamma emitters		
Other alpha, beca q galana entitlers	۱ بو	237
Organics posticides q intermediates	1)(54)
Wost radius & intermediates	- 1 (35)
herbicides & intermediates		365
nerbicitys & Intermediates	إلع	30)
fungicides & intermediates	91(37)
rodenticides & intermediates	016	381
halogenated aliphatics	ح بد	703
naiogenated allphatics	ין עו	29)
halogenated aromatics	111	40)
acrylates & latex emulsions	<u> </u>	41)
PCP / DPP 1	ز بد	12)
PCB/PBB's	אַ עַבּ	42)
amides, amines, imides	91(43)
plastizers	ن ت	441
para and a second	ا نج	46)
resins	ין עפ	45)
elastomers	91(46)
solvents polar (except water)	Ti i	47Š
carbontetrachloride	٠, بـ	101
Carbontectacinoriue	ΠŻ	40)
trichloroethylene	11(49)
other solvents nonpolar		SO)
solvents halogenated aliphatic	L >	E 1 1
solvenes hatogenated alliphatic	цŅ	31)
solvents halogenated aromatic	11(52)
oils and oil sludges		53)
esters and ethers	ין יי	5 (1)
esters and ediers	<u> </u>	24 J
alcohols	1 (55)
ketones & aldehydes	()	56)
dioxins	اع بيد	571
The state of the s	יין עצ	2//
Inorganics	110	58)
salts	$\overline{1}$ 0	59ì
mercaptans	رر بــ	601
Hotelptalls	T 7.	50)
Misc)) رو	υl)
pharmaceutical wastes	916	62)
paints ξ pigments	رز ہے	หรับ
processor & playmentary reconstruction of the control of the contr	או ג'	ردن
catalysts (eg. vanadium, platinum, palladium)	93 ((04)
asbestos	911	65)
shock sensitive wastes (eg nitrated teluenes)	رز بے	(6)
simulative mastes (eg. intraced tottenes)	אַ עב	uoj
air water reactive wastes (eg. Pa, aluminum chloride)	9J ((٥7)
asbestos shock sensitive wastes (eg. nitrated toluenes) air water reactive wastes (eg. P4, aluminum chloride) wastes with flash point below 100° F	916	68)
	`` لىك	- /

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Con	mpany Name:	Allied Chem	ical Co	orporation			
Fac	ility Name:	Baker and A	damson	Works		=	
	e of Site:	Kinsley Lan	dfill			-	
Add	lress of Site:					•	
		no. str	rcet		•		
		Deptford, No	ew Jers	sey			
	•	city		state	zip code		
	e of Owner (wh	ile used by facil	lity): _	don't know	7		
MUU	1055.	no. str	reet		 	.,	
				·			
		city		state	zip code		
_		city			-		
		different from a	above):_	don t know	,		
Maa	ress:	no. str	reet				-
					•		
	• 	city		state	zip code		
		City		State	zip code		
 3. 4. 5. 6. 	Ownership at company owners Current status IF (Year first use Year last use still in use) Total amount (Specify type(mership still in year closeste from the from the thousand thousand thousand thousand thousand thousand	ownership; 2=p) n use; 9=don't sed n this facilit this facility di gallons tons d cubic yards used at site	crivate but to know) (enter "79" sposed at signal whether	19 197 ite:	[2] (11) [9] (12) [13-14) [2] (15-16) [4] (17-18) [4] (19-26) [5] (27-35)
8.	Taciffes on.	site (1=this fac ly; 3=this compan	landfill landfill landfill pits/por deep wel land far incinera treatmer reproces other (s ility; 2 y and ot	ethis facilit thers; 9=don't	trial waste te efuse co-dis lizing) g y and other know)	sposed	9 (42) 9 (43) 9 (44) 9 (45) 9 (46) 9 (47) 9 (48) 9 (50) 9 (51) 9 (52)
	LIST NAMES A	ND ADDRESSES OF O	THER IS	WN USERS BELO	W		

The process wastes sent to the landfill averages approximately 75% water and 25% solids. The Heavy Metals and Trace Metals were present in minute quantities and were required to be listed as contained in the process waste.

Analysis of the water portion for January, February and March, 1973 is as follows:

Metal	Quantity
Arsenic	<0.01
Selenium	No analysis
Antimony	No analysis
Mercury	<0.0006 ppm
Iron .	<9.1 ppm
Manganese	<1.4 ppm
Magnesium	No analysis
Zinc	<2.3 ppm
Cadmium	No analysis
Copper	<0.027 ppm
Chromium	<1.2 ppm
Chromium ⁺⁶	No analysis
Lead	< 0.3 ppm

Facility Name:			Adamson	
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Site Name: Kinsley Landfill

9. Components (or characteristics) of process waste from this facility
disposed at site: (l=present in waste; 2=not present in waste;
9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	1:	21 (10)
pickling liquor	13	គ្នា (អាវ
metal plating waste		21 (12)
circuit etchings		
inorganic acid manufacture	با	
morganic acid magniaccure	ي ٠٠٠	살았던
organic acid manufacture	نا ٠٠٠	31 (T2)
Base solutions, with pH>1012	يَا	ST (10)
caustic soda manufacture	12	չյ (17)
nylon and similar polymer generation	12	(18)
scrubber residual	12	ที (19)
Heavy metals & trace metals (bonded organically of inorganically)		7 (20)
arsenic, selenium, antimony		1 (21)
mercury		
institut y	· · · 년	1 (22)
iron, manganese, magnesium	· • • •	ردعي
zinc, cadmium, copper, chromium (trivalent)	[]	[24]
chromium (hexavalent)	· • <u>19</u>	பு (25)
lead	11	」(26)
Radioactive residues, >50pico curies/Liter 6899	19	(27)
uranium residuals & residuals for UF6 recycling	19	1 (28)
lathanide series elements and rare earth salts	. 19	7 (29)
phosphate slag		7 (30)
thorium	. 12	7 (37)
radium		
Addition	15	1 (34)
other alpha, beta & gamma emitters	[9	J (SS)
Organics.	19) (34)
pesticides 4 intermediates	. 19	[(35)
herbicides & intermediates		
fungicides & intermediates	19	(37)
rodenticides & intermediates	19	(38)
halogenated aliphatics	. 10	(39)
halogenated aromatics		
acrylates & latex emulsions	. 15	1 6415
PCB/PBB's	5	1 (32)
	6] (44)
amides, amines, imides	· · <u>9</u>] (43)
plastizers	19_	[44]
resins	19	(45) إ
elastomers	19	(46)
solvents polar (except water)	j	(47)
carbontetrachloride	19	(48)
trichloroethylene	<u>F</u>	(49)
other solvents nonpolar	🗗	î (50)
solvents halogenated aliphatic	<u>P</u>	1 (51)
solvents halogenated aromatic	6	(52)
oils and oil sludges	13	1 (22)
esters and ethers	โล	(53)
alcohole	! 9	1 (24)
alcohols	19	1 (22)
ketones & aldehydes	•• वि] (56)
dioxins	· • [a	(57) ر
Inorganics	·· Ll	յ (58)
salts	11	[59]
mercaptans	9	(60)
Misc	19	(61)
pharmaceutical wastes		1 (62)
paints & pigments	10	(63)
paints & pigments	. 12	1 (64)
achoetne	Ğ	1667
asbestos	5	1 (65)
show sometime wastes (eg. Hitrated toluenes)	2	1 (00)
air water reactive wastes (eg. P4, aluminum chloride)	· · <u>L2</u>	(67)
wastes with flash point below 100° F	<u> 9</u>	յ (68)

COMPLETE THIS FORM FOR EMERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Сотрапу	Name:	Allie	d Chemical	Corporat:	ion			
Facility	/ Name:	Baker	and Adams	on Works		 		
Name of	Site: of Site:	Conco	rd Townshi	p Landfil'	<u> </u>			
MUU1 C33	or bite.	no.	street		•	-		
		Elam.	Pennsylvar	nia				
		city	1 Childy I van	state	zip code			
		•	e 1917		•	•		
Name oi Address:		hile used by on't know	facility): _	Concord 1	Ownship			
aler obb		no.	street			ي مسا		
		city	•	state	zip code			
Current	Owner (i	f different :	from above):	don't	know	····		
Address:		no.	street			_	,	
		110.	Screet		•			
•		city	····	state	zip code	<u></u>		
		CZC			225 0000			
2. Owner compositions of the compositions of t	ership at any owne ent stat IF first use last use 1 in use 1 amount	time of use rship) 3=publus (1= closed CLOSED, specsed for procesd for procesd for process with the contract of process with the contract of process with the contract of the	(1= company lic ownership l; 2= still i lify year clo less waste from waste from th thousan hundred thousan sal method(s) lify in use;	ownership; o) on use; 9=do esed om this facil it is facility d gallons it tons d cubic yar used at si 2=no longer	located; 2= of 2=private but n't know) ity (enter "7; disposed at second to the and whether in use; 3=new	not	6191	(11) (12) (13-1) (15-1) (17-1) (19-2)
faci	lities o	nly; 3=this c	landfil landfil landfil pits/po deep we land fa inciner treatme reproce other (s facility; company and o	1, mixed in 1, drummed 1, municipa nds/lagoons 11 injection ming ation nt (eg. neu ssing/recyc specify) 2=this faci thers; 9=do	dustrial waste waste l refuse co-di n tralizing ling lity and other n't know)	isposed	<u> </u>	(42) (43) (44) (45) (46) (47) (48) (49) (50) (51) (52)
LIS	T NAMES A	AND ADDRESSES	OF OTHER KN	OWN USERS B	ELOW			

The only process waste sent to the landfill were the still bottoms from the distillation of Dichloroacetal-dehyde. The Dichloroacetalkehyde was purchased and not manufactured at B&A Works. The composition of the process wastes were 30% Dichloroacetaldehyde residues and 70% Sulfuric Acid

Facility Name:	Baker and Adamson Works
Site Name:	Concord Township Landfill

9. Components (or characteristics) of process waste from this facility
disposed at site: (l=present in waste; 2=not present in waste;
9=don't know)

FILL IN EVERY BLOCK SPACE

FILL IN EVERT BLOCK SPACE	
Acid solutions, with pH<3	111 (10
pickling liquor	
metal plating waste	121 (12
circuit etchings	121 (13
inorganic acid manufacture	[2] (14
organic acid manufacture Base solutions, with pH>10/12	(15
Base solutions, with pH>1012	[2] (16
caustic soda manufacture	12) (17
nylon and similar polymer generation	[2] (18
scrubber residual	[2] (19
neavy metals & trace metals (bonded organically or inorganically)	볡썷
arsenic, selenium, antimony	131 (27
iron, manganese, magnesium	191 (23
zinc, cadmium, copper, chromium (trivalent)	
chromium (hexavalent)	19 (25
lead	(26
lead	191 (27
uranium residuals & residuals for UF4 recycling	10 I (28
lathanide series elements and rare earth salts	191 (29
phosphate slag	19 (30
thorium	9 (31
radium	32) روا
other alpha, beta & gamma emitters	9 (33
Organics.	1 (34)
herbicides & intermediates	[8] (35)
fungicides & intermediates	9 (37
rodenticides & intermediates	9 (38
halogenated aliphatics	(39
halogenated aromatics	(40 (40
acrylates & latex emulsions	9 (41
PCB/PBB's	9 (42)
amides, amines, imides	9 (43)
plastizers	9 (44)
resins	9 (45)
elastomers	9 (46)
solvents polar (except water)	9 (47)
carbontetrachloride trichloroethylene	9 (48,
other solvents nonpolar	9 (49)
solvents halogenated aliphatic	9 (50)
solvents halogenated aromatic	52
oils and oil sludges	g (53)
esters and ethers	9: (54)
alcohols	9 (55)
ketones & aldehydes	9 (56)
dioxins	0.1(57)
Inorganics	(58)
salts	1 (59)
mercaptans	ളി (60)
Misc	(61) رو
pharmaceutical wastes	91 (62) 31 (63)
paints & pigmentscatalysts (eg. vanadium, platinum, palladium)	31 (81)
ashestes	A . (65)
shock sensitive wastes (eg. nitrated toluenes)	81 (09)
shock sensitive wastes (eg. nitrated toluenes) air water reactive wastes (eg. P4, aluminum chloride) wastes with flash point below 100° F.	(67) <u>د ج</u>
wastes with flash point below 1000 F	31 (68)
	7. (°°)

The process wastes sent to the landfill averages approximately 75% water and 25% solids. The Heavy Metals and Trace Metals were present in minute quantities and were required to be listed as contained in the process waste.

Anaylsis of the water portion of the sludge for year 1978 are as follows:

<u>Metal</u>	Quantity
Arsenic	<0.03 ppm*
Selenium	<0.05 ppm*
Antimony	No analysis*
Mercury	<0.0003 ppm
Iron	<0.9 ppm
Manganese	<1.6 ppm
Magnesium	<8.4 ppm
Zinc	<0.4 ppm
Cadmium	<0.04 ppm
Copper	<0.9 ppm
Chromium	<0.1 ppm
Chromium ⁺⁶	<0.02 ppm
Lead	<0.3 ppm

^{*}Not used in manufacturing processes.

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Fac Nam	pany Name: Allied Chemical Corporation ility Name: Baker and Adamson Works e of Site: Geological Reclamation Operations & W ress of Site: Bordentown and New Ford Mill Road no. street	aste	Systems, (GROWS)	Inc
	Morrisville, Pennsylvania 19067 city state zip code			
	e of Owner (while used by facility): R. D. Ragsdale, Jr. ress: P. O. Box 180	. ,		
	no. street		•	
	Morrisville, Pa. 19067			
	city - state zip code			
	rent Owner (if different from above):			
	no. street			
	•			
	city state zip code			
 3. 4. 5. 6. 	Company ownership) 3=public ownership) Current status (l= closed; 2= still in use; 9=don't know) IF CLOSED, specify year closed Year first used for process waste from this facility Year last used for process waste from this facility (enter "79" still in use) Total amount of process waste from this facility disposed at si thousand gallons hundred tons thousand cubic yards Specify type(s) of disposal method(s) used at site and whether is still in use (l=currently in use; 2=no longer in use; 3=neve 9=don't know) landfill, mono industrial waste	if ite: inethocer used	[2] ([[2] ([(11) 12) 13-14 15-16 (17-18 (19-26 (27-33 (54-41)
	landfill, mixed industrial waste landfill, drummed waste landfill, mumicipal refuse co-dis pits/ponds/lagoons deep well injection land farming incineration treatment (eg. neutralizing) reprocessing/recycling other (specify) Users of this site (1=this facility; 2=this facility and other facilities only; 3=this company and others; 9=don't know)	posed	11 (12 (19 (19 (19 (19 (43) 44) 45) 46) 47) 48) 49) 50) 51)
-	LITET MANCE AND ADDRESSES OF OTHER CYCKEN LISTED DELOW			

Analysis of the water portion of the sludge for year 1978 are as follows:

Organic	Quantity
Carbon Tetrachloride	∠ 0.01 ppm*
Trichloroethylene	< 0.01 ppm
Oil and Grease	∠ 21.6 ppm
Dichlorobenzene	∠ 0.2 ppm
Genesolv® D	∠ 0.27 ppm
Chloroform	<pre>< 0.025 ppm*</pre>
Tetrachloroethylene	∠ 0.04 ppm
Methylene Chloride	∠ 0.05 ppm

^{*}Not used in manufacturing processes.

One sample of the sludge (dry basis) was run in year 1976. The results are as follows:

<u>Metal</u>	Quantity
Arsenic	No analysis*
Selenium	No analysis*
Antimony	No analysis*
Mercury	1.5 ppm
Iron	1%
Manganese	0.3%
Magnesium	0.7%
Zinc	0.01%
Cadmium	7 ppm
Copper	0.07%
Chromium ⁺³	0.2%
Chromium ⁺⁶	No analysis*
Lead	0.4%

^{*}Not used in manufacturing processes.

Fac	cility Name: <u>Baker and Adamson Works</u>		
Si	te Name: GROWS		
9.	Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)		**.
	FILL IN EVERY BLOCK SPACE		
	Acid solutions, with pH<3.		
	pickling liquor	121	(12)
	circuit etchingsinorganic acid manufacture	121	(14)
	organic acid manufacture Base solutions, with pH>:10 (2	121	(16)
	caustic soda manufacture	121	(18)
	scrubber residual	121	(19)
	arsenic, selenium, antimony	11	(21)
	iron, manganese, magnesium	111	(23)
•	chromium (hexavalent)	iΤ	(25)
	lead	9	(27) (28)
	lathanide series elements and rare earth salts	191	(29)
	thorium	191	(31)
	other alpha, beta & gamma emitters	191	(33)
	Organics Wostaldes & intermediates herbicides & intermediates		(35)
	fungicides & intermediates	19 1	(37)
	halogenated aliphatics	11	(39)
	acrylates & latex emulsions	9	(41)
	PCB/PB3's	191	(43)
	plastizersresins	191	(45)
	elastomers	191	(47)
	carbontetrachloride	111	(49)
	other solvents nonpolar solvents halogenated aliphatic	Ī	(51)
	solvents halogenated aromatic	Π	(53)
	esters and ethers	19 1	(55)
	ketones & aldehydes	19 1	(57)
	Inorganics	Πī	(59)
	mercaptans	19 1	(61)
	pharmaceutical wastes	<u>.</u>	(63)
	catalysts (eg. vanadium, platinum, palladium)	9	(64) (65)
	air water reactive wastes (eg. P ₄ , aluminum chloride)	12.1	(67)
	wastes with flash point below 100° F	9	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Facility Name: Baker and Adamson Works Name of Site: Knickerbocker Sanitary Landfill Address of Site: Box 456 no. street Malvern, Pennsylvania 19355 city state zip code Name of Owner (while used by facility): don't know Address: no. street city state zip code	
Address of Site: Box 456	
Name of Owner (while used by facility): don't know Address: no. street city state zip code	
Name of Owner (while used by facility): don't know Address: no. street city state zip code	
Name of Owner (while used by facility): don't know Address: no. street city state zip code	
Address:	
no. street city · state zip code	
,	
,	
Current Owner (if different from above): don't know	
Address:no. street	
city state zip code	
company ownership) 3=public ownership) [2] (11 3. Current status (1= closed; 2= still in use; 9=don't know) [2] (12 IF CLOSED, specify year closed [19] [13 4. Year first used for process waste from this facility [197 16] (15 5. Year last used for process waste from this facility (enter "79" if still in use) [197 19] (17 Total amount of process waste from this facility disposed at site: thousand gallons [197 19] (17 hundred tons [197 19] (17 Thousand cubic yards [197 19] (34 7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know) landfill, mono industrial waste [9] (42)) -14 -16 -18 -26 -33 -4]
landfill, mixed industrial waste 9 (43 landfill, drummed waste 9 (44 landfill, municipal refuse co-disposed 9 (45 pits/ponds/lagoons 9 (46 deep well injection 9 (47 land farming 9 (48 incineration 9 (49 treatment (eg. neutralizing) 9 (50 reprocessing/recycling 9 (51 other (specify) 9 (52 8. Users of this site (1=this facility; 2=this facility and other company	
facilities only; 3=this company and others; 9=don't know))

The process wastes sent to the landfill averages approximately 75% water and 25% solids. The Heavy Metals and Trace Metals were present in minute quantities and were required to be listed as contained in the process waste.

Analysis of the water portion of the sludge for year - 1978 are as follows:

<u>Metal</u>	Quantity
Arsenic	<0.03 ppm*
Selenium	<0.05 ppm*
Antimony	No analysis*
Mercury	<0.0003 ppm*
Iron	<0.9 ppm
Manganese	<1.6 ppm
Magnesium	<8.4 ppm
Zinc	<0.4 ppm
Cadmium	<0.04 ppm
Copper	<0.9 ppm
Chromium	<0.1 ppm
Chromium ⁺⁶	<0.02 ppm
Lead	< 0.3 ppm

^{*}Not used in manufacturing process.

Analysis of the water portion of the sludge for year 1978 are as follows:

Organic	Quantity
Carbon Tetrachloride	< 0.01 ppm*
Trichloroethylene	< 0.01 ppm
Oil and Grease	<21.6 ppm
Dichlorobenzene	<0.2 ppm
Genesolv® D	<0.27 ppm
Chloroform	<0.025 ppm*
Tetrachloroethylene	<0.04 ppm
Methylene Chloride	<0.05 ppm

^{*}Not used in manufacturing processes.

One sample of the sludge (dry basis) was run in year 1976. The results are as follows:

Metal	Quantity
Arsenic	No analysis*
Selenium	No analysis*
Antimony	No analysis*
Mercury	1.5 ppm
Iron	1%
Manganese	0.3%
Magnesium	0.7%
Zinc	0.01%
Cadmium	7 ppm
Copper	0.07%
Chromium ⁺³	0.2%
Chromium ⁺⁶	No analysis*
Lead	0.4%

^{*}Not used in manufacturing processes.

Facility Name: _	Baker	and	Adamson	WOTKS
Site Name:	Knicke	erboo	cker	

9. Components (or characteristics) of process waste from this facility disposed at site: (l=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	10)
nickling liquor	11)
pickling liquor	121
circuit etchings	131
inorganic acid manufacture	14)
niorganic acid manufacture	727
organic acid manufacture	197
Base solutions, with photo- [4]	16)
caustic soda manufacture	1/)
nylon and similar polymer generation	18)
sembler residual	191
Heavy metals & trace metals (bonded organically of inorganically)	20)
arsenic, selenium, antimony	21)
mercury [] (22Ì
iron, manganese, magnesium	23)
zinc, cadmium, copper, chromium (trivalent)	24)
chromium (hexavalent)	75)
land	26)
lead	227
Radioactive residues, 2001co curies/#14-04-William	20)
uranium residuals & residuals for UF6 recycling	40 <i>)</i>
lathanide series elements and rare earth salts	29) 20)
phosphate slag	
thorium	
radium 9j (32)
other alpha, beta & gamma emitters	33)
Organics	54)
postacions q intermediates	35)
herbicides & intermediates	36)
fungicides & intermediates	37)
rodenticides & intermediates	38)
halogenated aliphatics	
halogenated aromatics	40)
acrylates & latex emulsions	411
PCB/PBB's	
amides, amines, imides	12) 12)
plastizers	147
resins	+4 J
elastomers	10)
solvents polar (except water) carbontetrachloride	1/)
Carbontetrachioride	18)
trichloroethylene	19)
other solvents nonpolar	50)
solvents halogenated aliphatic	
solvents halogenated arcmatic	52)
oils and oil sludges	53)
esters and ethers	54)
alcohols	55)
ketones & aldehydes	(6)
dioxins 19: (5	57)
Inorganics	58)
salts	เชา
mercaptans	50 i
Misc	
pharmaceutical wastes	52)
paints & pigments	551
catalysts (eg. vanadium, platinum, palladium)	31)
asbestos	/4/ (E)
shock sensitive wastes (eg. nitrated toluenes)	13) 14)
oir rator reactive reactes (og. D. elemines ablasida)	,0) :=:
air water reactive wastes (eg. P4, aluminum chloride))/)
wastes with flash point below 100° F	(טו

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company N	ame:	Allied	Chemical	Corporati	on		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Facility i			nd Adams				**
Name of S	ite:		ne Corpoi	cation			
Address of	f Site:	500 For					
		no.	street		•	-	
		Hamilto	n)hio	45011		
		city	· · · · · · · · · · · · · · · · · · ·	state	zip code		
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Address:	wner (wn	ile used by f	acility):	Sam	<u>e</u>		
		no.	street			,	
-		city		state	zip code		
Current O	wner (if	different fr	om abovel:		•	ì	
Address:	(11	444	om doorey.			· ·	
•		no.	street	•			
		•		:	•		
•		city		state	zip code		
			•				
3. Currer 4. Year if 5. Year if still 6. Total 7. Specifies sti	ny owner it statu IF first us last use in use) amount	ship) 3=publi s (1= closed; CLOSED, speci ed for process of process wa s) of disposa	c ownershi 2= still fy year cl s waste fr waste from t thousa hundre thousa l method(s ly in use;	p) in use; 9=do osed om this faci m this facility nd gallons d tons nd cubic ya:) used at si 2=no longer	2=private but on't know) ility lity (enter "7 y disposed at te and whether in use; 3=ne	19]197 9" if19½ site:1111 r method ver used;	[9] (12) 1 (13-14) 16] (15-16) 16] (17-18) 1 (19-26) 12] (27-33) 1 (34-41)
			landfi landfi landfi	<pre>11, mixed in 11, drummed 11, municipa onds/lagoons</pre>	ndustrial wast waste al refuse co-d	e isposed	9 (43) 19 (44)

Fa	cility Name: Baker and Adamson Works		
Si	te Name: Chem Dyne Corp.		/
9.	Components (or characteristics) of process waste from this facility disposed at site: (l=present in waste; 2=not present in waste; 9=don't know)		ଦ୍
	FILL IN EVERY BLOCK SPACE		
	Acid solutions, with pH<3. pickling liquor metal plating waste circuit etchings inorganic acid manufacture organic acid manufacture	2 2 2 2 2 2 2 2 2 2 2 2 2 3 2 3 2 3 2 3	(12) (13) (14) (15)
	Base solutions, with pH>1012. caustic soda manufacture nylon and similar polymer generation scrubber residual	121	(17) (18)
	Scrubber residual Heavy metals & trace metals (bonded organicallyon inorganically) arsenic, selenium, antimony mercury	19	(21) (22)
•	iron, manganese, magnesium zinc, cadmium, copper, chromium (trivalent) chromium (hexavalent) lead	9	(24) (25)
	lead Radioactive residues, > Sopico curies/liter CRAM uranium residuals & residuals for UF6 recycling lathanide series elements and rare earth salts phosphate slag thorium radium other alpha, beta & gamma emitters	NAMANA NAMANA	(28) (29) (30) (31) (32)
•	Organics positions & intermediates herbicides & intermediates fungicides & intermediates rodenticides & intermediates halogenated aliphatics halogenated aromatics acrylates & latex emulsions PCB/PB3's amides, amines, imides plastizers resins elastomers solvents polar (except water) carbontetrachloride trichloroethylene other solvents nonpolar	والمرموس والمراوات	(36) (37) (38) (39) (40) (41) (42) (43) (44) (46) (47) (48) (49)
	solvents halogenated aliphatic. solvents halogenated arcmatic oils and oil sludges esters and ethers alcohols ketones & aldehydes dioxins Inorganics salts mercaptans Misc.		(52) (53) (54) (55) (56) (57) (58) (60)
	pharmaceutical wastes paints & pigments catalysts (eg. vanadium, platinum, palladium) asbestos shock sensitive wastes (eg. nitrated toluenes) air water reactive wastes (eg. P4, aluminum chloride) wastes with flash point below 100° F.		(62) (63) (64) (65) (66)

PROVIDE A COMPLETE LIST OF ALL FIRMS AND INDEPENDENT CONTRACTORS, INCLUDING THE COMPANY AND ITS AFFILIATES AND SUBSIDIARIES, USED TO REMOVE PROCESS WASTES FROM THIS FACILITY SINCE 1950.

Company Name: Allied Ch	emical Corporation		
Facility Name: Baker and	Adamson Works		•
Name of Firm or Contractor	Address	ICC # (If Known)	Years Used
K.T. Railroad Equipment Company	Whippany, NJ	don't know	1978
Larber Trucking	Niagara Falls, NY	don't know	1978-1979
McAdoo Associates	McAdoo, PA	don't know	1978
Harvey and Harvey	Newport, Delaware	don't know	1978
East Coast Pollution Control Inc.	Cenco Blvd. P. O. Box 275 Clayton, NJ © 8321	don't know	1977-1979
Eastern Waste Removal	Deptford, NJ	don't know	1972-1979
Gene Banta Trash Removal	Box 59 Chester, PA 19016	don't know	1964-1979
Pennsylvania Railroad (Penn Central)	30th St. Station Phila., PA 19104	-	1976

Bre more - Other Remains

San Mark John

19.00 MAI

ATTACHMENT 2 DELAWARE VALLEY WORKS CLAYMONT, DE



RECEIVED JUN 1 9 1980 E. J. Mattioli

E. J. Shjelds

T. D. Kent W. M. Reiter

Chemicals Company P.O. Box 1139R Morristown, New Jersey 07960

June 13, 1980

Mr. Joseph J. C. Donovan, Attorney UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region III Curtis Building 6th & Walnut Streets 19106 Philadelphia, Pennsylvania

RE: United States v. Melvin Wade, et al Civil Action Number 79-1426 Eastern District of Pennsylvania

Dear Mr. Donovan:

Please refer to Mr. P. F. Vaira's letter of May 23, 1980 addressed to Mr. P. L. Brueckner, the Chemicals Company Delaware Plant Manager, requesting information with respect to possible dealings between our Company and ABM Disposal Company.

In your telephone conversation of June 2, 1980, with David Van Epps, it was agreed that we would review available records for plant locations within a distance of the ABM site which would indicate possible use, i.e., Pennsylvania, New Jersey, Maryland, and Delaware. Mr. Van Epps indicated at that time that our normal record retention policy for Morristown, NJ central files provides for destruction of purchase records after three years.

A review of the central purchasing files indicates no record of any business transaction with ABM, but these records go back only to 1978.

You may be aware that on May 27, 1980, we were notified by the City of Philadelphia of their intent to assess us and various other industries for the rehabilitation of property known as the Enterprise Avenue Landfill. According to the City, the illegal disposal of waste liquids both in drums and in bulk was conducted by ABM Disposal Company and Lightman Drum Company between 1974 and 1976. We have requested the City to assist us by providing any factual basis for their assessment.

June 13, 1980 Page 2



Our review of Delaware Plant location purchasing files turned up information included in correspondence to the City of Philadelphia, dated April 6, 1979 (Attachment I) and June 12, 1979 (Attachment II). This information tended to confirm shipments to ABM from our Claymont, Delaware plant and possible use of that firm by our former Camden Plant.

In the correspondence, you will note the following references:

- 1. Attachment I Three bulk shipments from the Claymont, Delaware plant in January and February, 1973 consigned to ARM, Inc. were composed of sodium sulfite/sulfate liquors, an oil/water mix from a sluiceway, and an oil/wastewater mix from a hydrofluoric acid operation. Although plant personnel believe these shipments were made, we are currently unable to locate documents to confirm this.
- 2. Attachment II 1224 tons of phosphoric acid and phosphate residues shipped in bulk from Claymont, Delaware plant to ABM, Inc. during 1972 and 1973. Purchase Order No.21171, issued 4/17/72, (Attachment III) refers to the removal of 20,200 cubic feet of material which is equivalent to 1224 tons.

In addition, we have located Purchase Order No.23499, issued 10/27/72, with associated invoice (Attachment IV) indicating that an estimated 140 tons of 71% phosphoric acid were proposed to be shipped to ABM. We believe (based on the invoice) 92 tons of material were actually shipped during 1972 and 1973.

Additionally, we have asked that location purchasing records within the 4-state area be reviewed promptly. We will correspond further should additional information be obtained by these locations.

If you have any indication of use by Allied Chemical of the ABM site beyond the information noted above, please furnish this as an aid to our search.

We trust the information will be helpful in your investigation. If there are any questions, please call Mr. Van Epps at (201) 455-2457.

Very truly yours,

II. Handle

ALLIED CHEMICAL CORPORATION Chemicals Company

G. Kanelis

Supervisor-Environmental Administration

GK/lal Attachments

cc: P. L. Brueckner

H. D. Finkelstein

G. D. Van Epps



Attachment I

Industrial Chemicals Division P.O. Box 1139R Morristown, New Jersey 07960

April 6, 1979

Mr. Thomas Kulesza, Chief Industrial Waste Unit Water Pollution Control Division 1180 Municipal Services Building Philadelphia, PA 19107

Re: ABM, Inc.

Dear Mr. Kulesza:

This is in reference to your phone call of several weeks ago to our Mr. L. A. Mattioli concerning our use of ABM inc. for waste disposal. This letter will also confirm Mr. Mattioli's phone call in response.

We believe that our former Camden, New Jersey facility utilized the services of ABM Inc. to remove trash and refuse. This belief is based on conversations with former employees at Camden. Since silicate production operations at Camden were terminated in May, 1975 and the facility sold in June, 1976, records are not readily available. Of the records reviewed, none indicate what type of material was removed by ABM Inc., or, indeed, even that ABM Inc. removed any material. However, as stated above, we feel that ABM Inc. was utilized in some trash and refuse removal from the Camden facility.

As Mr. Mattioli informed you, our "dead record" files have not been reviewed since we seriously doubt that these records would reveal any substantive information concerning the nature of the materials removed by ABM Inc. Therefore, we do not intend to extend our investigation into these files. In addition, we wish to point out that it is our belief that any information in these files would be limited to copies of purchase orders similar in content to those which you found in ABM Inc.'s records.

During our review of the records mentioned above, we found evidence that ABM Inc. was used for disposal of waste from our Claymont, Delaware plant. Our records indicate that in January and February, 1973 three bulk shipments were consigned to ABM Inc. These shipments were composed of sodium sulfite/sulfate liquors, an oil/water mix from a sluiceway and an oil/wastewater mix from a hydrofluoric acid operation. We have found no information indicating which dumpsite was used by ABM Inc. for these shipments.

-2-

Attackment I (20/2)

Should you have further questions regarding this matter, please contact me.

Very truly yours,

J. M. DeVoe

Assistant Director Environmental Services

/ss

cc: L. A. Mattioli

- - -



Industrial Chemicals Division P.O. Box 1139R Morristown, New Jersey 07960

June 12, 1979

Mr. Thomas Kulesza, Chief Industrial Waste Unit Water Pollution Control Division 1180 Municipal Services Building Philadelphia, PA 19107

Re: ABM, Inc.

Dear Mr. Kulesza:

This letter will confirm the information concerning shipments from Allied Chemical's Claymont Delaware Plant to ABM, Inc. that Mr. Leon Mattioli gave you by telephone yesterday.

Our letter of April 6, 1979 listed the shipments to ABM, Inc. indicated in plant records. Further searching of the records has uncovered a total of 1224 tons of Phosphoric Acid and phosphate residues shipped in bulk from the Claymont Delaware Plant to ABM, Inc. during 1972, 1973. We do not have information indicating which dumpsite was used by ABM, Inc. for these shipments.

If you have any further questions regarding these shipments, please contact me.

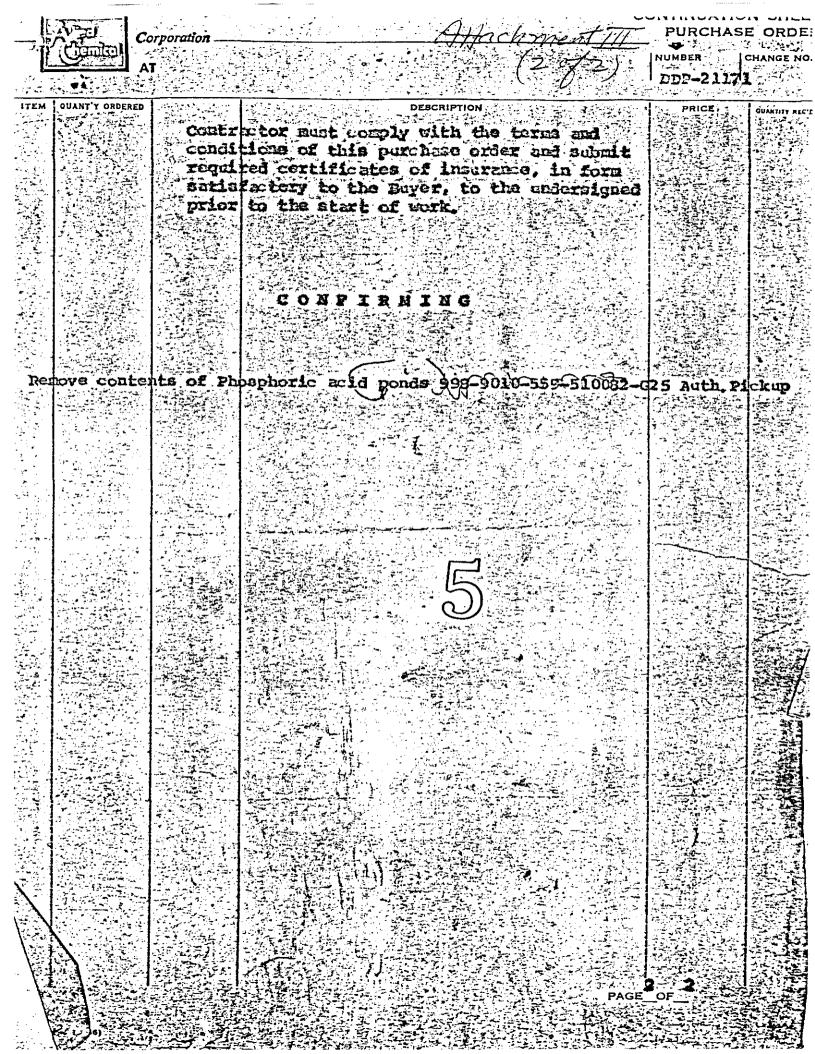
Very truly yours,

J. M. DeVoe

Assistant Director Environmental Services

JMD:MCM:cc

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Attackment IV

PURCHASE ORDER

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DELAWARE DISTRICT PURCHASING HARCES HOOF, PA. 19061

DDP-23632

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Contractor shall comply with the attached "Plant Safety Regulations for Contractor."

Contractor must comply with the terms and conditions of this purchase order and submit required certificates of insurance, in form satisfactory to the Buyer, to the undersigned prior to the start of work.

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INDUSTRIAL CHEMICALS DIVISION ALLIED CHAMIAL CORPORATION DELAVARE WORKS

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Law Department P.O. Box 2245R Morristown, New Jersey 07960

July 10, 1980

CERTIFIED MAIL

Howard D. Finkelstein Assistant U.S. Attorney Eastern District of Pennsylvania 3310 U.S. Court House Philadelphia, PA 19106

Re: U.S. v. Melvin Wade, et al. Civil Action No. 79-1426

Dear Mr. Finkelstein:

In response to your letters of May 23 and 29, 1980 and discussion by telephone with Joseph J. C. Donovan, Esq., Region III, Environmental Protection Agency, Allied Chemical undertook to aid your investigation of ABM by having our purchasing records reviewed for Pennsylvania, New Jersey, Delaware and Maryland for references to ABM, Lightman Drum Company and the Enterprise Landfill. We informed Mr. Donovan at that time that the corporate policy for retention of purchasing documents is to retain these for three years and then to discard them. As a precaution, in anticipation that this policy may not have been rigidly followed outside of the corporate headquarters, we requested the plants within the four state area to check for any purchasing records as far back as 1970. This search was done on an expedited basis.

When the above search was completed, Allied Chemical responded directly to Mr. Donovan by letter of June 13, 1980 to which you were a copyholder. Subsequently, on June 20th Mr. Donovan telephoned me to indicate receipt of the letter and to advise that certain other apparent transactions had occurred, in his view, between ABM and Allied Chemical. This information was summarized in his letter to me of June 26, 1980 (copy attached).

During the June 20th telephone discussion, Mr. Donovan indicated that he wished Allied plant representatives to appear for an interview with your office during the week of June 30th. This discussion was held on July 1, 1980 in your offices with Mr. Donovan and Mr. Harvey Paige, a chemist from E.P.A., Region III. In anticipation of assisting the Justice Department and Mr. Donovan in deciphering the purchase documents furnished by us in our letter of June 13th and to interpret as best as possible the documents Mr. Donovan claims to have indicating other transactions, we had undertaken a further check specifically aimed at the items indicated by Mr. Donovan in his telephone call. Unfortunately, his letter, dated June 26, 1980, was not received by my office until June 30, 1980 and a copy was given to me by Mr. Donovan at the interview on July 1st.

Mr. Donovan a so asked on June 20th that the persons attending this interview be knowledgeable of the processes at the four plants identified by him as apparently having had some contact with ABM, i.e., Allied's Claymont, B&A, and Frankford plants and our former Camden Works. The persons attending the interview were in fact knowledgeable of these processes and prepared to address this question. The purpose of inquiring as to the processes was said on June 20th by Mr. Donovan to be to identify a "universe" of materials, products and potential wastes from these facilities which could have been removed by ABM. I asked Mr. Donovan at the time whether our providing such information created any implication that we had disposed of such materials through ABM (or in any way) and was advised that it did not. Mr. Donovan identified his purpose as simply to provide information which would be useful in the ABM litigation, U.S. v. Wade. He did say at that time that he could not rule out the possibility that any information provided by us would be used later in a suit against Allied Chemical as a generator of these materials but did not indicate that such a suit was contemplated.

Coming into the interview with this frame of reference, we believed that the purpose was to identify as best we could certain documents and, although it did not appear to us to be directly related to your ABM litigation, to describe the four plants in terms of process. We had in our letter of June 23, 1980 reserved any and all rights concerning this matter. This was done for two reasons. Mr. Donovan had stated the potential for a lawsuit and our attempted reconstruction of the possible transactions with ABM was necessarily uncertain in view, among other things, of the dates of these apparent transactions. For the record, we continue to reserve such rights.

Upon arriving in your offices in Philadelphia, the Justice Department was not present and Mr. Donovan conducted the interview.

The interview appeared to have very little to do with the ABM law suit.

We were not permitted to see the documents which we purportedly had been asked to identify. As Allied Chemical had not been indicated to be a target of your litigation this fact is puzzling. Instead Mr. Brueckner, the present Delaware Valley plant manager, was quizzed by Mr. Donovan regarding the identity of people in the plant in 1973-1976 who could conceivably have initiated or known of waste disposal without any references whatsoever to ABM. Mr. Donovan also began an inquiry regarding the plant division and corporate structure as to the responsibility of persons for disposal of waste.

After this line of inquiry had followed its course for some time, I asked Mr. Donovan if he would indicate the purpose of this interview as it appeared to me that the interview to that point had had nothing to do with the Justice Department investigation of ABM. I further indicated that the persons present were prepared to try to reconstruct as best they could what could have been involved in the transactions uncovered by Allied and other transactions indicated to us by Mr. Donovan.

Mr. Donovan responded that he viewed his inquiry as proper and if we were uncooperative, he would have no choice but to bring us into a lawsuit. - He carefully pointed out several times upon making such remarks that he did not intend them to be considered a "threat".

In view of the change in tenor of the interview from what we had believed to be its purpose, it was necessary to instruct our interviewees to address the apparent transactions with ABM and the plant processes.

Ultimately, the information provided by Allied in its letter of June 13th and the information provided by Mr. Donovan in his telephone call of June 20th and letter of June 26th was addressed.

It was at this point, that I inquired if we could see and/or have copies of the documents which we had been asked to address. We were told that we could not have access to these documents.

Mr. Brueckner reviewed the purchase orders to ABM concerning the demolition of the phosphate fertilizer plant included with our June 13th letter. He offered his judgment as to the types of materials removed. As to the purported purchase orders from the Claymont plant to ABM dated January 26, and February 5, 1973, referred to by Mr. Donovan, he believed these to be related to the clean up of spilled No. 6 and No. 2 fuel oil from within diked areas at the plant. He reported that the plant had been unable to locate copies of these purchase orders in the files. With respect to the referenced letter concerning three fluorine cylinders, Mr. Brueckner explained that, when this item had been checked, plant personnel had believed that such cylinders would not have been disposed of by Allied Chemical and, accordingly, looked in a file concerning the return of cylinders to Allied Chemical. They found a receipt for the return of three cylinders by ABM to Allied Chemical which was shown to Mr. Donovan (copy attached).

Concerning the Camden Works, Mr. Brueckner advised that he had worked in a similar facility with similar product lines and identified the nature of the materials manufactured and the raw materials. I reiterated the information furnished to the City of Philadelphia indicating that Allied had found no purchasing documents with ABM. It was believed, however, that ABM may have furnished trash pick-up services to the Camden works. Mr. Brueckner also noted that the facility had been shut down around 1975 and sold in 1976.

Mr. Bresland speaking with respect to the Frankford works indicated that during 1976, in connection with an operation at the plant which had been discontinued around 1971, certain storage tanks had been demolished and others reconditioned. Reconstructing from available information, Mr. Bresland stated that he believed two of the tanks had been used to store No. 2 fuel oil, two of the tanks had stored caustic solution and that the remaining tanks had been used to hold various materials associated with the process. He advised that he believes a contract had been let by Allied Chemical to Mobile Hydro Hydraulics of Devault, Pennsylvania in 1976 for removal of liquid, hydroblasting of the tanks and removal of the tank heels. The liquid was identified in a response to the EPA as having a pH of 11.5 and 13,000 ppm of phenolics. It was supposed that these phenolic waters had been left over when the process was discontinued and, therefore, had relatively little commercial value. is believed that while the process was operating they would have been recycled back into the process. Mr. Bresland also indicated that apparently samples of the materials removed had been provided to Mobile Hydro Hydraulics as indicated by the contract.

I will appreciate your furnishing me with copies of the Summons and Complaint in the above-captioned action and any answer which has been filed. If you furnish us with copies of the documents referenced by Mr. Donovan in his June 26th letter we will try to interpret these for you.

As indicated to Mr. Donovan, Allied Chemical will undertake to re-review purchasing, accounts payable and other documents for the period 1973 to 1976 for any further indication of use of ABM by Allied Chemical at these locations, as Mr. Donovan requested. If indications of such are found we will communicate the information to you.

Very truly yours,

G. David Van Epps

cc: Messrs. Brueckner Shields
Bresland
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ALLIED CHEMICAL - RETURNS AND ALLOWANCES

INDUSTRIAL CHEMICALS DIVISION SPECIALTY CHEMICALS DIVISION

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